

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA

Alexandria Division

ROBERTO CLAROS, et al.,

Plaintiffs,

v.

SWEET HOME IMPROVEMENTS, INC.,  
et al.,

Defendants

Case No. 1:16-cv-344-AJT-MSN

**DEFENDANTS' SUPPLEMENTAL RESPOND TO  
ROBERTO CLAROS' FIRST SET OF DISCOVERY REQUESTS**

**Interrogatories**

1. Please state your current job title and list all of your job duties. State your past job titles and past job duties since January 1, 2010. If your job title or duties changed during this time, describe the change, state when it occurred, and state why it occurred.

**Answer:**

Mr. Myung Koo worked as a subcontractor, working mostly on windows for Centroval Window for approximately five years beginning in 2005. His job duties included framing and installing windows on project site, but gained other skills necessary for a general contractor such as framing and general plumbing work. He quit his job when he formed a general contractor company called Sweet Home Improvements, Inc., a Virginia corporation ("Company").

On February 2, 2011, Mr. Koo and Mrs. Mi Ae Koo started the Company. He is currently one of the owner/director and is also the president of the Company. He owns 100% of the Company. As director of the Company, Mr. Koo is responsible for approving all Company management and operation. As president of the Company, Mr. Koo is responsible for



contractor on the project. Also working with them were Darwing Rivera and Jose Dominguez as noted in the invoices submitted by Jose Claros, a copy of which is provided with this discovery.

18. Please identify all individuals who have information or documents relevant to Roberto Claros's claims or Defendants' defenses to those claims. Describe, in reasonable detail and in a non-conclusory manner, the information and documents identified.

Answer:

Mr. and Mrs. Koo, who will testify that Roberto Claros was working for Jose Claros and was paid for his work, apart from the few payments that was saved and produced with this discovery response. All answers to interrogatories hereto will be used by Mr. and Mrs. Koo in their defense.

19. Please identify any documents that would have been responsive to one or more of Plaintiffs' requests for production of documents, but that no longer exist. Describe the contents of each such document, identify all authors and recipients, state when the document was created, and explain fully why the document no longer exists. Identify any individuals who were involved with or have any knowledge of the destruction of that document, and fully explaining that individual's knowledge or involvement.

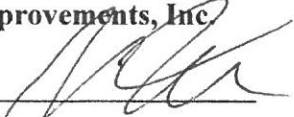
Answer:

Cancelled checks are no longer available and would take three to four weeks to produce at cost of approximately \$800 for each year. Defendants have ordered the bank account statements and will produce them in supplementary answer as soon as received.

20. If you relied on any outside source (whether a person, a document, or anything else) to determine or ensure that your payroll practices complied with federal, state, or local law, please identify all such sources, and describe fully the nature of the advice or guidance you received from that source. If the source is written, produce the document in full. As part of your answer, specifically identify all occasions on which you consulted each source, and identify and produce any documents that you provided to that source. As part of your answer, if you maintained or made available any labor/employment law posters, or other similar postings, provide a copy of all such posters or postings, and describe in detail where and when they were posted, and by whom.

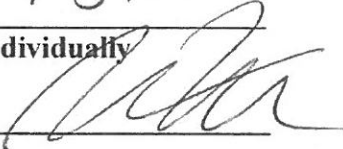
I declare, under penalty of perjury of the laws of the United States, that my answers to Plaintiff Roberto Claros's First Set of Interrogatories are true and correct. 28 U.S.C. § 1746(2).

Name: Myung Koo  
Myung Koo, President  
Sweet Home Improvements, Inc.

Signature: 

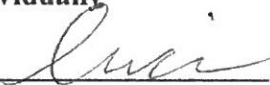
Executed on (date): 06/24/16

Name: Myung Koo  
Myung Koo, individually

Signature: 

Executed on (date): 06/21/2016

Name: Miae Koo  
Miae Koo, individually

Signature: 

Executed on (date): 06/21/2016